

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO: <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i> Case No. 1:20-cv-00946-RMB-SAK	HON. RENÉE MARIE BUMB

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE
OPINIONS OF DEFENSE EXPERT NADIM MAHMUD M.D., M.S.,
M.P.H., M.S.C.E**

PLEASE TAKE NOTICE, Plaintiffs shall move before the Honorable Renée Marie Bumb, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Nadim Mahmud.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of C. Brett Vaughn in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**NIGH GOLDBERG RASO
& VAUGHN, PLLC**

Attorneys for Plaintiffs

Dated: May 22, 2025

By: /s/ C. Brett Vaughn

C. Brett Vaughn, RN, BSN, JD

NIGH GOLDBERG RASO &
VAUGHN, PLLC

Attorneys for Plaintiffs

14 Ridge Square NW Third Floor

Washington, D.C. 20016

Tel: 202-792-7927

Fax: 202-792-7927

Email: bvaughn@nighgoldenberg.com

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

**NIGH GOLDENBERG RASO
& VAUGHN, PLLC**
Attorneys for Plaintiffs

By: /s/ C. Brett Vaughn